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SAFMC COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 2 (CE-BA 2)

The Southeastern Fisheries Association (SFA) East Coast Fisheries Section (ECFS) submits the following recommendations about the SAFMC Comprehensive Ecosystem-Based Amendment 2 (CE-BA 2).

ACTION 1: REMOVE OCTOCORALS FROM THE FISHERY MANAGEMENT UNIT (FMU) UNDER THE SOUTH ATLANTIC CORAL FISHERY MANAGEMENT PLAN (FMP)
SFA ECFS supports SAFMC (Preferred) Alternative 1 (No Action) to not remove Octocorals from the FMU under the South Atlantic Coral FMP.

ACTION 2: EXTEND THE SAFMC'S FMU FOR OCTOCORALS INTO THE GULF OF MEXICO FISHERY MANAGMENT COUNCIL'S (GMFMC) AREA OF JURISDICTION
SFA ECFS supports SAFMC (Preferred) Alternative 2 to extend the management boundaries for all Octocoral species in the Coral FMP to include the GMFMC jurisdiction.

ACTION 3: MODIFY THE ALLOWABLE CATCH LIMIT (ACL) FOR OCTOCORALS IN THE SOUTH ATLANTIC
SFA ECFS supports the SAFMC (Preferred) Alternative 2 modifying the existing ACL in the South Atlantic and Gulf of Mexico (ACL = current 50,000 colony quota for South Atlantic and Gulf of Mexico Exclusive Economic Zone (EEZ)) to include State waters.

ACTION 4: MODIFY MANAGEMENT OF SOUTH CAROLINA'S SPECIAL MANAGEMENT ZONES (SMZ)
SFA ECFS supports the SAFMC (Preferred) Alternative 2 to limit harvest and possession of Snapper Grouper species (with the use of all non-prohibited fishing gear) in South Carolina's SMZ to the recreational bag limit.
SFA ECFS supports the SAFMC (Preferred) Alternative 3 to limit harvest and possession of Coastal Migratory Pelagic (CMP) species (with the use of all non-prohibited fishing gear) in South Carolina's SMZ to the recreational bag limit.
SFA ECFS opposes Alternative 4 prohibiting use of hand spear and spear guns in South Carolina SMZ's.

ACTION 5: MODIFY SEA TURTLE RELEASE GEAR REQUIREMENTS FOR THE SNAPPER GROUPER FISHERY
SFA ECFS supports Alternative 5 modifying the design specifications of the current Sea Turtle release and Smalltooth Sawfish gear equipment for all federally permitted non-longline Snapper Grouper vessels with hook and line gear on board to match the specifications described in the NOAA Fisheries Service (NMFS) document entitled "Careful Release Protocols for Sea Turtle Release with Minimal Injury."

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These new design criteria allow for less "heavy-duty" gears more appropriate for lighter tackle used by Snapper Grouper fishermen.

SFA ECFS supports Sub-Alternative 5a recommended by the NMFS Southeast Regional Office of Protected Species Division to remain in compliances with the Biological Opinion. This choice would require all federally permitted non-longline Snapper Grouper vessels with hook and line gear on board:

- a short-handled dehooker for ingested hooks, or a short-handled dehooker for external hooks
- cushion/support device (i.e., standard automobile tire or boat cushion)
- long-nose or needle-nose pliers
- bolt-cutters
- mono-filament line cutters
- a dipnet
- at least types of mouth openers / mouth gags

ACTION 6: AMEND THE SNAPPER GROUPER FMP TO DESIGNATE NEW ESSENTIAL FISH HABITAT-HABITAT AREAS OF PARTICULAR CONCERN (EFH-HAPC'S)
SFA ECFS supports SAFMC (Preferred) Alternative 3 to designate EFH-HAPC's for the Snapper Grouper complex to include Deepwater Marine Protected Areas (MPAs).

ACTION 7: AMEND THE CORAL FMP TO DESIGNATE NEW EFH-HAPC'S
SFA ECFS supports Alternative 1 for No Action. Do not amend the Coral FMP to designate new EFH-HAPC's and allow the existing designations to remain in effect.

ACTION 8: AMEND THE FMP FOR PELAGIC SARGASSUM HABITAT TO DESIGNATE NEW EFH
SFA ECFS supports Alternative 3 to amend the Sargassum FMP to designate the top 10 meters of the water column in the South Atlantic EEZ bounded by the Gulfstream, as EFH for pelagic Sargassum.

ACTION 9: AMEND THE FMP FOR PELAGIC SARGASSUM HABITAT TO DESIGNATE EFH-HAPC'S
SFA ECFS supports Alternative 1 for No Action. Do not designate EFH-HAPC's for Pelagic Sargassum.

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